

Victor H. Farrell Jr.
Multiple Machining, Inc.
10150 Lenover Street
Dillsboro, IN 47018

Dear Victor H. Farrell Jr.:

Re: Exempt Construction and Operation Status,
029-12967-00012

The application from Multiple Machining, Inc., received on November 20, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following parts washer for machine shop operation, to be located at 10150 Lenover Street Dillsboro, IN 47018, is classified as exempt from air pollution permit requirements:

- (a) one (1) conveyorized degreaser using Stoddard Solvent at the maximum rate of 4 gallons per day for cleaning aluminum and steel parts.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 8-3-4 (Organic Solvent Degreasing Operations: conveyorized degreaser operation), The owner or operator of a conveyorized degreaser shall:
 - (1) minimize carryout emissions by:
 - (A) racking parts for best drainage;
 - (B) maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (2) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
 - (3) repair solvent leaks immediately, or shut down the degreaser;
 - (4) not use workplace fans near the degreaser opening;
 - (5) not allow water in solvent exiting the water separator; and
 - (6) provide a permanent, conspicuous label summarizing the operating requirements.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS

cc: File – Dearborn County
Dearborn County Health Department
Air Compliance – Warren Greiling
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Multiple Machining, Inc.
Source Location: 10150 Lenover Street, Dillsboro, IN 47018
County: Dearborn
SIC Code: 3429
Operation Permit No.: 029-12967-00012
Permit Reviewer: Gurinder Saini

The Office of Air Management (OAM) has reviewed an application from Multiple Machining, Inc. relating to the construction and operation of parts washer for machine shop.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) conveyorized degreaser using Stoddard Solvent at the maximum rate of 4 gallons per day for cleaning aluminum and steel parts.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This is the first air approval for this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the **construction and operation** be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on November 21, 2000.

Emission Calculations

See Appendix A page 1 of 1 of this document for detailed emissions calculations.

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	4.77
CO	-
NO _x	-

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 10 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 and an Exemption will be issued.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO ₂	Unclassifiable
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Dearborn County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	-
PM10	-
SO ₂	-
VOC	4.77
CO	-
NO _x	-
Single HAP	-
Combination HAPs	-

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because it does not use any halogenated solvents.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Dearborn County and the potential to emit VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of conveyorized degreaser will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-3-4 (Organic Solvent Degreasing Operations: conveyorized degreaser operation)

This degreaser was constructed after January 1, 1980. Therefore this rule is applicable to it.

Pursuant to 326 IAC 8-3-4 (Organic Solvent Degreasing Operations: conveyorized degreaser operation), The owner or operator of a conveyorized degreaser shall:

- (1) minimize carryout emissions by:
 - (A) racking parts for best drainage;
 - (B) maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (2) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (3) repair solvent leaks immediately, or shut down the degreaser;
- (4) not use workplace fans near the degreaser opening;
- (5) not allow water in solvent exiting the water separator; and
- (6) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-7 (Organic Solvent Degreasing Operations: Conveyorized degreaser operation and control)

This degreaser is not subject to this rule because the air to solvent interface is less than 2 square meters.

Conclusion

The *construction and operation* of this parts washer for machine shop shall be subject to the conditions of the attached proposed Exemption 029-12967-00012.

Appendix A: Emission Calculations

Degreasing Operations

Company Name: Multiple Machining, Inc.
Address City IN Zip: 10150 Lenover Street, Dillsboro, IN 47018
CP: 029-12967
Pit ID: 029-00012
Reviewer: GS
Date: November 28, 2000

Degreaser I.D.	Material	Density (lbs/gal)	Quantity Used		VOC Emissions	
			(gal/day)	(gal/year)	(lbs/year)	(tons/year)
Conveyorized	Stoddard Solvent	6.54	4	1460.0	9,548.4	4.77
Total Emissions:					9,548.4	4.77

Methodology

VOC Emissions (lbs/year) = Density (lbs/gal) * Quantity Used (gal/year)

VOC Emissions (tons/year) = Density (lbs/gal) * Quantity Used (gal/year) / 2000 (lbs/ton)